REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed November 7, 2006 ("Office Action"). At the time of the Office Action, Claims 1-71 were pending and Claims 1-26, 35-41, 50-56, and 65-71 were withdrawn. The Examiner rejects Claims 27-34, 42-49, and 57-64. Applicants amend Claims 27, 42, and 57. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

Claim Objections

The Examiner rejects Claim 27 due to informalities.[1] Specifically, the Examiner states that the claim is objected to because "the pre-set list of hostile applications" lacks antecedent basis. Applicants have amended Claim 27 to revise the term "the pre-set list of hostile applications" to recite "the pre-set list of applications." Antecedent basis for the amended claim language may be found in Applicants' step of "providing, on a workstation, a pre-set list of applications permitted to run on the workstation . . ." Accordingly, Applicants respectfully request that the objections to Claim 27 be withdrawn.

Section 112 Rejections

First, the Examiner rejects Claims 27, 42, and 57 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner states "[t]he phrase 'in response to determining that the unspecified application is not identifiable in the pre-set list of hostile applications' is not properly described in the application as filed." Without conceding the veracity of the Examiner's rejection of the recited claim language, Applicants have amended Claims 27, 42, and to 57 to remove the recited claim language.

Second, the Examiner rejects Claims 27, 42, and 57 under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the Examiner states that "[t]he phrases "a pre-set list of applications permitted to run on the workstation;" "allowing access . . . if the requested

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[1] In the Final Office Action, the Examiner objects to Claim 1. However, since Claim 1 is cancelled, Applicants believe that the Examiner intended to object to Claim 27.

computer resources is not on the list . . ." and "preventing access . . . if the requested computer resource is on the list . . ." are not clear on what the metes and bounds of the claims are, the claims appear to cover anything and everything that does not prohibit actions from occurring." (Final Office Action, page 4).

Since Applicants believe that it is clear what the metes and bounds of the claims are, Applicants traverse this rejection of Claims 27, 42, and 57. For example, Claim 27 recites "providing, on a workstation, a pre-set list of applications permitted to run on the workstation **and** a list of one or more computer resources on the workstation to which are not accessible to unspecified application." Thus, amended Claim 27 recites both "a pre-set list of applications" and "a list of one or more computer resources on the workstation to which are not accessible to unspecified applications." Amended Claim 27 further recites that "each of the one or more computer resources [is] selected from the group consisting of system files, information, equipment, data and memory allocation." When a request for access is received from an unspecified application, the method includes "determining that the unspecified application is not identifiable in the pre-set list of applications." The request for access "identif[ies] a computer resource . . . to which the unspecified application seeks access," and further steps in the method of Claim 27 include "determining whether the requested computer resource is on the list of one or more computer resources that are not accessible to unspecified applications," "allowing access to the requested computer resource if the requested computer resource is not on the list of one or more computer resources," and "preventing access to the requested computer resource if the requested computer resource is on the list of one or more computer resources." Accordingly, Applicants submit that the metes and bounds of Claims 27, 42, and 57 are clear and that the claims are in accordance with 35 U.S.C. § 112, second paragraph.

For at least these reasons, Applicants respectfully request that the 35 U.S.C. § 112 rejections be withdrawn. Applicants request reconsideration and allowance of Claims 27, 42, 57, together with Claims 28-34, 43-49, and 58-64 which depend respectively therefrom.

Specification Objections

The Examiner objects to the amendment filed August 24, 2006 under 35 U.S.C. 132(a) because it introduces new matter into the disclosure. It the Examiner's position that the claim language reciting "in response to determining that the unspecified application is not identifiable in the pre-set list of hostile applications" is not supported by the original disclosure. Additionally, the Examiner objects to the specification as failing to provide proper antecedent basis for the recited claimed language. Without conceding the veracity of the Examiner's objection to the Specification, Applicants have amended Claims 27, 42, and to 57 to remove the recited claim language.

Section 103 Rejections

The Examiner rejects Claims 27-32, 34, 42-47, 49, 57-62, and 64 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,092,194 issued to Touboul ("*Touboul*") in view of U.S. Patent No. 5,859,966 issued to Hayman et al. ("*Hayman*"). The Examiner rejects Claims 33, 48, and 63 under 35 U.S.C. § 103(a) as being unpatentable over *Touboul* in view *Hayman* and further in view of U.S. Patent No. 5,987,523 issued to Hind et al. ("*Hind*"). For the reasons discussed below, Applicants respectfully request reconsideration and allowance of Claims 27-34, 42-49, and 57-64.

Independent Claim 27 of the present Application, as amended, recites:

A method for preventing hostile use of computer resources by an application running on a workstation, comprising:

providing, on a workstation, a pre-set list of applications permitted to run on the workstation and a list of one or more computer resources on the workstation to which are not accessible to unspecified applications;

providing a filter on a workstation for receiving internal requests for computer resources resident on the workstation;

receiving at the filter a request for access generated by an unspecified application downloaded to the workstation from a source external to the workstation, the request for access identifying a computer resource resident on the workstation to which the unspecified application seeks access;

determining, by the filter on the workstation, that the unspecified application is not identifiable in the pre-set list of applications;

determining, by the filter on the workstation, whether the requested computer resource is on the list of one or more computer resources that are not accessible to unspecified applications;

allowing access to the requested computer resource if the requested computer resource is not on the list of one or more computer resources; and

preventing access to the requested computer resource if the requested computer resource is on the list of one or more computer resources.

Thus, Applicant's claim recites "providing, **on a workstation** . . . a list of one or more computer resources **on the workstation** to which are not accessible to unspecified applications." Applicant's claim further recites "providing a filter **on a workstation** for receiving internal requests **for computer resources resident on the workstation**" and "receiving **at the filter [on the workstation]** a request for access . . . identifying a computer resource **resident on the workstation** to which the unspecified application seeks access." Finally, Applicant's claim also recites "determining, **by the filter on the workstation**, that the unspecified application is not identifiable in the pre-set list of applications" and "determining, **by the filter on the workstation**, whether the requested computer resource is on the list of one or more computer resources that are not accessible to unspecified applications."

In the previous Response to Office Action submitted on August 24, 2006 (*"Previous Response"*), Applicants argued that *Touboul* (as relied upon by the Examiner) does not disclose, teach, or suggest "providing, **on a workstation**, a pre-set list of applications permitted to run on the workstation and a list of one or more computer resources on the workstation." Specifically, Applicants noted that *Touboul* relates to an "internal network security system 110 [that] examines Downloadables received from external computer network 105, and prevents Downloadables deemed suspicious **from reaching the internal computer network**." (Column 3, lines 9-12, emphasis added). Thus, *Touboul* is a **network based application** designed to prevent hostile Downloadables from breaching the internal network. In the Summary of the Invention, *Touboul* stipulates that the "security policy many include a default security policy to be applied regardless of the client to whom the Downloadable is addressed, a specific security policy to be applied based on the client or the group to which the client belongs, or a specific policy to be applied based on the client/group

and on the particular Downloadable received." (Column 1, line 67 through Column 2, line 5). As shown in Figure 1, which is described as "a block diagram illustrating a network security system," the "Internal Network Security System" is illustrated as being placed between the "External Computer Network" and the "Internal Computer Network." (Column 2, lines 39-41; Figure 1). Accordingly, the description and figures of *Touboul* support Applicant's contention that *Touboul* does not disclose, teach, or suggest the performance, "on the workstation," of the operations recited above.

Applicants further submit that these deficiencies are not cured by the disclosure of *Hayman*. As discussed in the *Previous Response*, *Hayman* discloses "a security system for a computer system in which specific limitations are imposed on who has access to exactly what computer functions and data on the computer system." (Column 1, lines 48-51). Accordingly, the *Hayman* system determines the permissibility of user-requested computer functions on a user-by-user basis. The *Hayman* system is designed to address the problem created when "more and more computers become connected together into large computer networks, sometimes stretching across the globe." (Column 1, lines 13-17). Accordingly, the *Hayman* system "basically involves breaking up the totality of computer functions into required privileges and assigning different privileges to each user depending on the particular job which that user is to do on the computer system." (Column 1, lines 57-61)." Thus, *Hayman* also does not disclose, teach, or suggest the particular combination of features and operations recited in Applicant's steps of "providing, **on a workstation** . . . a list of one or more computer resources **on the workstation** to which are not accessible to unspecified applications," "providing a filter **on a workstation** for receiving internal requests **for computer resources resident on the workstation**," "receiving **at the filter [on the workstation]** a request for access . . . identifying a computer resource **resident on the workstation** to which the unspecified application seeks access," "determining, **by the filter on the workstation**, that the unspecified application is not identifiable in the pre-set list of applications," and "determining, **by the filter on the workstation**, whether the requested computer resource is on the list of one or more computer resources that are not accessible to unspecified applications," as recited in Claim 27.

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claim 27, together with Claims 28-34 that depend from Claim 27.

Independent Claims 42 and 57 recite certain features that are analogous to those discussed above. For example, Claim 42 recites "a processor **on a workstation. . .** operable to . . . maintain a pre-set list of applications permitted to run **on the workstation** and a list of one or more computer resources **on the workstation** that are not accessible to any unspecified applications." Claim 42 also recites that "in response to a request received from the unspecified application," the processor is operable to "determine that the unspecified application is not identifiable in the pre-set list of applications and "determine whether a requested computer resource is on the list of one or more computer resources on the workstation that are not accessible to any unspecified applications." Claim 57 recites logic operable when executed to "maintain, **on a workstation,** a pre-set list of applications permitted to run **on the workstation** and a list of one or more computer resources **on the workstation** to which are not accessible to unspecified applications." The logic is also operable to "provide a filter **on a workstation** for receiving internal requests for computer resources resident on the workstation," "determine, **by the filter on the workstation,** that the unspecified application is not identifiable in the pre-set list of applications permitted to run on the workstation" and "determine, **by the filter on the workstation,** whether the requested computer resource is on the list of one or more computer resources that are not accessible to unspecified applications." Accordingly, for reasons similar to those discussed above, Applicants respectfully submit that the proposed *Touboul-Hayman* combination does not disclose, teach, or suggest each and every limitation of Applicants' Claims 42 and 57.

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claims 42 and 57, together with Claims 43-49 and 58-64 that depend from Claims 42 and 57, respectively.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

No fee is believed to be due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

If there are matters that can be discussed by telephone to further the prosecution of this application, Applicants respectfully request that the Examiner call its attorney at the number listed below.

Respectfully submitted,

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